

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RETRACTABLE TECHNOLOGIES, INC. Plaintiff	
v.	02MC139
BECTON DICKINSON & COMPANY, et al. Defendants	

**PARTIES UNOPPOSED MOTION TO STAY PROCEEDINGS
REGARDING THE EMERGENCY CARE RESEARCH INSTITUTE'S
("ECRI") MOTION TO QUASH OR IN THE ALTERNATIVE
FOR A PROTECTIVE ORDER**

Comes now Plaintiff, Retractable Technologies, Inc. ("RTI") and Movant, Emergency Care Research Institute ("ECRI"), and files this their Unopposed Motion to Stay Proceedings regarding ECRI's Motion to Quash or in the Alternative for Protective Order. Supporting this motion, the parties respectfully show this Honorable Court the following:

1. On or about May 28, 2002, ECRI filed with the Court it's Motion to Quash Pursuant to Fed.R.Civ.P. 45(c) or in the Alternative for a Protective Order Pursuant to Fed.R.Civ.P. 45(c) and 26. Pursuant to Local Rule 7.1(c), Plaintiff was required to file a response to ECRI's Motion to Quash or in the Alternative for Protective Order on or before Monday, June 24, 2002.

2. The parties are attempting to resolve their differences and reach an agreement regarding the production of documents from ECRI and the designation of corporate representative of ECRI for deposition.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that the Court enter an order granting it's Unopposed Motion to Stay Proceedings regarding ECRI's Motion to Quash or in the alternative, Motion for Protective Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have forward a true and correct copy of the parties Unopposed Motion to Stay Proceedings regarding ECRI's Motion to Quash or in the Alternative Motion for Protective Order to the following counsel of record by U.S. mail, certified mail, return receipt requested, and/or facsimile transmission on this _____ day of June, 2002:

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